

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, et al.,</p> <p>Debtors.¹</p> <hr/>	<p>PROMESA Title III</p> <p>No. 17 BK 03283-LTS</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE EMPLOYMENT RETIREMENT SYSTEM OF THE COMMONWEALTH OF PUERTO RICO ("ERS"),</p> <p>Debtor.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 03566-LTS</p>

**INFORMATIVE MOTION WITH RESPECT TO THE ERS INDIVIDUAL PLAINTIFF'S
OPPOSITION AT DOCKET NO. 22175**

TO THE HONORABLE COURT:

Individual Plaintiffs, Pedro José Nazario Serrano; Joel Rivera Morales; María de Lourdes Gómez Pérez; Héctor Cruz Villanueva; Lourdes Rodríguez and Luis M. Jordán Rivera, all of them Retirees/Beneficiaries of the ERS and Plaintiffs in a claim for damages described below that is currently pending in the Commonwealth of Puerto Rico Court of First Instance,

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as bankruptcy case numbers due to software limitations).

San Juan Part (the “Commonwealth Court”), without submitting to the jurisdiction of this Court, very respectfully STATE and PRAY as follows:

1. It is hereby requested from this Honorable Court to take notice that, with regards to the Commonwealth Action, on September 23rd, 2022, they and the ERS filed a *Request for Authorization to Amend Pleadings*, together with a *Fifth Amended Complaint* before the Commonwealth Court.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That on this same date a true and exact copy of this motion was filed with the Clerk of Court using CM/ECF system, which will notify a copy to counsel of record.

In San Juan, Puerto Rico, this 23rd day of September 2022.

VICENTE & CUEBAS

P.O. Box 11609
San Juan, PR 00910-1609
Phone (787) 751-8000
Facsimile (787) 756-5250

/s/Harold D. Vicente
Harold D. Vicente, Esq.
USDC-PR Bar No. 117711
hvicente@vclawpr.com

/s/Harold D. Vicente-Colón
Harold D. Vicente-Colón, Esq.
USDC-PR Bar No. 211805
hdvc@vclawpr.com

PUJOL LAW OFFICES, PSC

P.O. Box 363042
San Juan, PR 00936-3042
Phone (787) 724-0900
Facsimile (787) 724-1196

/s/Francisco Pujol Meneses
Francisco Pujol Meneses, Esq.
USDC-PR Bar No. 212706
fpujol@pujollawpr.com

BUFETE ANDRÉU & SAGARDÍA

261 Avenida Domenech
San Juan, Puerto Rico 009718
Phone (787) 754-1777/763-8044
Facsimile (787) 763-8045

/s/José A. Andréu Fuentes
José A. Andréu Fuentes, Esq.
USDC-PR Bar No. 204409
jaf@andreu-sagardia.com

*Counsel for Individual Plaintiffs, Beneficiaries of the Retirement System
of the Commonwealth of Puerto Rico*